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District Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

**In re  
TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER**

**Debtor**

Tax ID #: 94-6002897  
Address: 869 N. Cherry St.  
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-46

Date: November 15, 2018

Time: 9:30 a.m.

Place: 2500 Tulare Street

Fresno, CA 93

Courtroom 13

Judge: Honorable René Lastreto II

**DECLARATION OF SANFORD HASKINS IN SUPPORT OF MOTION FOR ORDER  
AUTHORIZING ASSUMPTION OF UNEXPIRED NONRESIDENTIAL REAL  
PROPERTY LEASES PURSUANT TO STIPULATION  
(HEISKELL RANCHES, LP)**

1  
2 I, Sanford Haskins, hereby declare and represent as follows:

3 1. I am the Chief Administrative Officer ("CAO") of Tulare Local Healthcare  
4 District, dba Tulare Regional Medical Center ("District" or "Debtor"), the Debtor in the  
5 above-captioned Chapter 9 case.

6 2. I have personal knowledge of the facts contained herein and if I was called  
7 as a witness, I would and could testify as is set out in this Declaration. I am over the  
8 age of 18 and I am competent to testify as to the matters contained in this Declaration.  
9

10 4. As CAO of the District I am personally familiar with the issues to be  
11 resolved by this Motion.

12 5. I have personally reviewed the Motion for Order Authorizing Assumption of  
13 Nonresidential Real Property Leases Pursuant to Stipulation ("Motion"), which seeks  
14 authorization for the District to assume two nonresidential real property leases it has  
15 with Heiskell Ranches, L.P. ("Heiskell"), as described with more particularity below.

16 6. I personally reviewed and signed the Stipulation for Assumption of  
17 Nonresidential Real Property Leases ("Stipulation") which is filed concurrently herewith.

18 7. I assisted in the preparation of these documents and believe that the facts  
19 stated therein are true and correct.

20 8. As stated in the Motion and Stipulation, the District is a party to the  
21 following unexpired nonresidential real property leases with Heiskell (collectively  
22 referred to as the "Leases"):

23 i. Lease for 880 E. Merritt, Suites 105-106, Tulare , California  
24  
25 ("Family X-Ray Center Lease"); and

26 ii. Lease for 880 E. Merritt, Suites 107-109, Tulare , California  
27  
28 ("Mineral Kings Toxicology Lease").

True and correct copies of the Leases are attached to the Stipulation as Exhibits "A" and "B", respectively.

9. As CAO of the District, I have evaluated the Leases and considered the District's financial position. The Leases pertain to certain commercial property from which the District operates its x-ray center and toxicology laboratory. The District is the lessee and Heiskell Ranches is the lessor under the Leases. Using my best judgment on behalf of the District, I have determined that the Leases are essential to the District's operations and intended plan of adjustment and that, under the circumstances, the terms of the Leases are fair and reasonable and should be assumed.

10. The District is current on its obligations under the Leases.

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct to the best of my information and belief.

Executed this 31<sup>st</sup> day of August, 2018, at Fresno, California.

Sanford Haskins